

CM_CV2020061631_2810850

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Akron, Ohio 44308

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ELEGALSUPPLY.COM, LLC.
341 MULLICA HILL RD.
MULLICA HILL, NJ 080622661



CM_CV2020061631_2810851

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205 South High Street
Akron, Ohio 44308

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HORNER, JASON
341 MULLICA HILL RD.
MULLICA HILL, NJ 080622661

IN THE COURT OF COMMON PLEAS, SUMMIT COUNTY, OHIO

CASE NUMBER: CV-2020-06-1631

GOVERNMENT CONTRACT SERVICES, INC.
2507 E. Aurora Rd., Unit 1
Twinsburg, OH, 44087

-VS-

SUMMONS

ELEGALSUPPLY.COM, LLC.
341 Mullica Hill Rd.
Mullica Hill, NJ 08062

TO the following:

JASON HORNER
341 Mullica Hill Rd.
Mullica Hill, NJ 08062

You have been named as a defendant(s) in a complaint filed in the Summit County Court of Common Pleas, Summit County Courthouse, 205 S. High St., Akron, Ohio, 44308.

A copy of the COMPLAINT is attached hereto. The name and address of the Plaintiff's attorney is:

ANDREW J WIDES
1653 Merriman Road
Suite 203
Akron, OH 44313

You are hereby summoned and required to serve upon the attorney listed above, or upon the party if they have no attorney of record, a copy of an answer to the COMPLAINT within twenty-eight (28) days after service of this summon on you, exclusive of the day of service. Your answer must be filed with the Court within three days after the service of a copy of the answer on the attorney, or upon the party, if there is no attorney of record.

If you fail to appear and defend, judgment may be rendered against you for the relief demanded in the COMPLAINT.

Sandra Kurt
Summit County Clerk of Courts

June 3, 2020

**IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO**

GOVERNMENT CONTRACT SERVICES, INC.)	CASE NO.:
2507 E. Aurora Rd., Unit 1)	
Twinsburg, OH 44087)	JUDGE
)	
Plaintiff,)	<u>COMPLAINT</u>
)	(Jury Demand Enclosed)
-vs-)	
)	
ELEGALSUPPLY.COM, LLC.)	
341 Mullica Hill Rd.)	
Mullica Hill, NJ 08062-2661)	
)	
-and-)	
)	
JASON HORNER)	
341 Mullica Hill Rd.)	
Mullica Hill, NJ 08062-2661)	
)	
Defendants.)	

Now comes Plaintiff, Government Contract Services, Inc. ("GCS"), by and through its undersigned counsel, and for its Complaint alleges and avers as follows:

PARTIES

1. Plaintiff, GCS, in an Ohio Corporation licensed to transact business in the State of Ohio, with its principal place of business located in Summit County, Ohio.
2. Defendant, eLegalSupply.com, LLC ("LegalSupply"), is a limited liability company with its principal place of business in Mullica Hill, New Jersey. Defendant is engaged in the sale of legal supplies, is authorized to do business in the State of Ohio, and regularly conducts business in the State of Ohio.
3. Defendant, Jason Horner, is an individual residing in Mullica Hill, New Jersey.
4. Upon information and belief, Jason Horner is the statutory agent and president for

ELegalSupply.com.

VENUE AND JURISDICTION

5. Venue is proper pursuant to Civ. R. 3(C)(1), 3(C)(2), 3(C)(3), and 3(C)(6).
6. The Court has jurisdiction over this dispute and the parties.

STATEMENT OF FACTS

7. Plaintiff realleges and incorporates by reference the allegations made in the foregoing paragraphs as if fully rewritten herein.
8. On or about February 24, 2020, Plaintiff contacted Defendant Horner about assistance with Defendant LegalSupply's General Services Administration ("GSA") schedule. Plaintiff left Defendant Horner a voicemail
9. On or about February 25, 2020, Defendants posted a Google review ("The Review") about GSC leaving a one-star review.
10. The Review contained false and defamatory statements about Plaintiff.
11. The Review was authored by Defendant James Horner.
12. The Review is currently available on Google.
13. The Review falsely states that Plaintiff has "some very shady and deceiving advertising practices."
14. The Review falsely states that Plaintiff "purposefully attempted to present herself as government personnel" so that Defendant Horner would respond to Plaintiff's voicemail.
15. The Review falsely states that Plaintiff did not identify herself or the reason for leaving a voicemail.
16. As a direct and proximate cause of Defendants actions, Plaintiff has lost significant revenue.

17. As a direct and proximate cause of Defendants actions, Plaintiff's standing and reputation in the community has been damaged.

COUNT ONE
(Defamation)

18. Plaintiff realleges and incorporates by reference the allegations made in the foregoing paragraphs as if fully rewritten herein.

19. Defendants published false and defamatory statements of fact regarding Plaintiff in The Review.

20. The Review was published to third parties without privilege or permission.

21. Defendants failed to verify or corroborate any statement published in The Review.

22. Defendants' Review has caused significant financial loss to Plaintiff.

23. Defendants' Review has caused Plaintiff a loss of its reputation and standing in the community.

24. Defendants intentionally, willfully, wantonly, maliciously, recklessly, and/or negligently published false and defamatory statements about Plaintiff on Google.

COUNT TWO
(Punitive Damages)

25. Plaintiff realleges and incorporates by reference the allegations made in the foregoing paragraphs as if fully rewritten herein.

26. Defendants intentionally, willfully, wantonly, maliciously, and/or recklessly published false and defamatory statements about Plaintiff in The Review.

27. As a direct and proximate result of the intentional and/or malicious conduct, Defendants have caused Plaintiff significant financial damage.

28. As a direct and proximate result of the intentional and/or malicious conduct, Defendants

have caused Plaintiff significant damage to its standing and reputation in the community.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Government Contract Services, Inc. requests judgment and damages against the Defendants as to all counts for compensatory damages in an amount **WELL IN EXCESS OF \$25,000.00 (TWENTY-FIVE THOUSAND DOLLARS)**, punitive damages, plus attorney's fees, and interest at the statutory rate from the date of judgment, plus the costs of this action, and any other relief as the Court deems just and proper.

Respectfully submitted,

/s/ Andrew J. Wides

Andrew J. Wides (0091633)

THE PECCHIO LAW FIRM

1653 Merriman Road, Suite 203

Akron, OH 44313

Phone: (330) 963-6600

Fax: (330) 963-6650

awides@pecchiolawfirm.com

Attorney for Plaintiff

JURY DEMAND

Pursuant to Rule 38(B) of the Ohio Rules of Civil Procedure, Plaintiff hereby demands trial by the maximum number of jurors allowed by law.

Respectfully submitted,

/s/ Andrew J. Wides

Andrew J. Wides (0091633)